

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
: Chapter 13
STEPHANIE BUTLER, :
Debtor. : Case No. 19-13308 (MDC)
: :
: **Hearing Date: 3/31/20**
: **Time: 10:30 a.m.**
: **900 Market Street #2**
:

**DEBTORS' RESPONSE TO MOTION OF NATIONSTAR D/B/A MR. COOPER FOR
RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362(d)**

The Debtor, Stephanie Butler, hereinafter referred to as the "Debtor," by and through her counsel, Center City Law Offices, LLC, hereby respectfully files her response to the Motion of Nationstar d/b/a Mr. Cooper ("Mr. Cooper") for Relief from the Automatic Stay under Section 362(d). For the reasons more fully set forth below, the Debtor submits that there is no basis for Mr. Cooper's Motion.

1. The Debtor has made the January and February 2020 payments allegedly not paid in Mr. Cooper's Motion. The Debtor will provide proof of the February payment at the hearing on this Motion. The March payment will be made in early April or included in an amended proposed plan payment.

WHEREFORE, the Debtor, Stephanie Butler respectfully prays this Honorable Court deny any and all relief requested presently by the Motion of Mr. Cooper.

Respectfully submitted,

CENTER CITY LAW OFFICES, LLC

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Dated: March 30, 2020